



February 19, 2015

Kentucky Board of Dentistry  
Attn: Mr. David Beyer and KBD Members  
312 Whittington Parkway, Ste 101  
Louisville, KY 40222

RE: Coronal Polishing Regulations

Dear Mr. Beyer, Dr. Zena and KBD Members:

The Kentucky Dental Hygienists' Association has reviewed the recent proposed changes to the coronal polishing regulations. As you are aware, the coronal polishing requirements were part of a negotiated piece of legislation between the Kentucky Dental Association and KyDHA. The legislation expanded the scope of the dental hygienist's practice and also expanded the dental assistant's duties to include coronal polishing, as long as certain training requirements were met. These training requirements were intentionally included to protect the public.

We have two major concerns with the proposed changes distributed at the last Board of Dentistry meeting. First, we are concerned that the amendments weaken the training requirements and put the public at greater risk for harm. As the regulations stand currently, we can be confident that the dental assistants are properly and thoroughly trained to ensure a minimum standard of care. The dental personnel that currently teach the course around the state are, in fact, educators and clinicians who have both experience in content delivery and assessing students in determining that they meet the minimum standards of clinical practice. With the proposed changes to the regulations, it will be impossible to ascertain that these minimum standards of clinical practice are met, thereby increasing the likelihood that the public could be placed in danger from improper polishing practice.

Second, we believe a number of the proposed changes are inconsistent with the statute and in at least one instance in conflict with state law. Specifically, we would call attention to KRS 313.045 (6)(b) and (c). KRS 313.045 (6) (b) requires that, "The assistant receive a certificate from the board's approved instructor that ensures the assistant has successfully completed a dental assisting course developed by the board and a committee of dental educators from Kentucky institutions of dental education accredited by the Council on Dental Accreditation." The Board's current regulation addresses this provision by requiring that the course be taught by the CODA accredited institutions in Kentucky. The Board certainly has latitude to change this

provision, but in our view, the law still requires the Board to develop a process for approving instructors and further requires that the course be developed by the Board and a committee of educators from the CODA approved institutions. The proposed changes are silent on how this requirement will be fulfilled. Additionally, KRS 313.045 (6)(c) requires that the course include competency testing, which makes the proposed change to 201 KAR 8:571 subsection (2)(o) in conflict with the statute. The Board certainly has the right to change the way the coronal polishing course is administered and has some leeway on course content, however, Kentucky law clearly requires that certain standards be met and requires the Board of Dentistry to provide oversight in order to protect public health.

Attached is a schedule from a coronal polishing course recently taught at Bluegrass Community and Technical College. We can also provide a schedule from the University of Louisville's coronal polishing course if you would like to review it. In our opinion, many important topics are addressed in the coronal polish course including proper infection control procedures, universal precautions, and ethical/jurisprudence considerations that are associated with the coronal polishing procedure. This course curriculum delivered by trained instructors is invaluable and provides a foundation that will increase the protection of the public. It teaches the dental assistant, even those that are trained "on the job" by other dental office employees, that the services they provide are held to the standards outlined by the Dental Practice Act, which can have serious legal sanctions if they do not adhere to them.

We look forward to the opportunity to discuss this matter more in depth with you as well as with the members of the Board of Dentistry. Please do not hesitate to contact us regarding this matter.

Sincerely,

*Donna Ruley, RDH*

Donna Ruley, RDH  
KyDHA Executive Director

# Kentucky's Coronal Polishing Training Program

## February 7, 2015

8:30 – 8:45	➤ Introductions	All
8:45 – 10:15	<ul style="list-style-type: none"> <li>➤ Define the Principles of Infection Control</li> <li>➤ Describe Universal Precautions</li> <li>➤ Practice Personal Protection</li> <li>➤ Perform the Handwash Technique</li> <li>➤ Practice Aseptic Operating Technique</li> <li>➤ Describe and Demonstrate the Zones of Activity</li> <li>➤ Position the Clinician</li> <li>➤ Demonstrate the Use of the Mouth Mirror</li> </ul>	Joanna Aalboe/ Kelly Dingrando
10:15 – 10:30	Break	
10:30 – 12:00	<ul style="list-style-type: none"> <li>➤ Identify and Describe the Dentitions and the Teeth</li> <li>➤ Identify the Teeth with Numbers and Letters</li> <li>➤ Identify the Surfaces of the Teeth</li> <li>➤ Describe the Parts and tissues of the Teeth</li> <li>➤ Describe General Tooth Morphology</li> <li>➤ Describe the Cervical Areas of the Permanent Teeth</li> <li>➤ Describe and Recognize Anatomy of the Periodontium</li> </ul>	Kelly Dingrando
12:00 – 12:30	<ul style="list-style-type: none"> <li>➤ Describe Calculus</li> <li>➤ Describe and Recognize Stains</li> </ul>	Joanna Aalboe
12:30 – 1:00	Lunch	
1:00 – 1:30	➤ Describe and Choose Equipment and Materials to Selectively Polish Teeth	Joanna Aalboe
1:30 – 2:30	➤ Dental Ethics and Jurisprudence related to Coronal Polishing by Dental Assistants	Sharlee Burch
2:30 – 3:30	<ul style="list-style-type: none"> <li>➤ Review materials for exam</li> <li>➤ EXAM (all day participants)</li> </ul>	
2:30 – 4:00	➤ Demonstrate and practice coronal polishing technique (half day participants)	SH, JA, KD, SS
3:30 – 5:00	➤ Demonstrate and practice coronal polishing technique (full day participants)	SH, JA, KD, SS,

## Board Member Payment Totals

### Travel and Per Diem

Fiscal Year 2014-15 (July 1 – February 28)

total		travel		per diems
BRANTLEY	\$6,940	Kathy King DMD	\$2,741	Sid Brantley DMD \$4,600
ZENA	\$6,352	Mara Beth Womack RDH	\$2,647	Robert Zena DMD \$4,400
KING	\$6,141	Sid Brantley DMD	\$2,340	Kathy King DMD \$3,400
WOMACK	\$5,047	Mary Ann Burch RDH	\$1,954	Mary Ann Burch RDH \$2,600
BURCH	\$4,554	Robert Zena DMD	\$1,952	Jason Ford DMD MD \$2,400
FORD	\$2,593	Byron Owens DMD	\$622	Mara Beth Womack RDH \$2,400
OWENS	\$2,222	Jason Ford DMD MD	\$193	Adam Rich DMD \$1,800
RICH	\$1,800	Adam Rich DMD	\$0	Byron Owens DMD \$1,600
HARGAN	\$800	James K Hargan DMD MD	\$0	James K Hargan DMD MD \$800



Board of Dentistry		FY 2009	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016
<b>Expenditures</b>								<b>Budgeted</b>	<b>Budgeted</b>
Regular Salaries & Wages	207,631	218,597	262,443	236,014	278,711	270,128		305,200	308,800
Seasonal Salaries & Wages	345	1,468	1,288	0	0	0		0	0
Comp Time-Block 50 Payments	1,234	0	0	0	0	0		0	0
Employers FICA	15,891	17,322	21,629	22,068	25,711	23,858		21,900	22,200
Employers Retirement	20,781	25,190	43,696	44,196	61,033	70,506		115,300	119,700
Employers Health Insurance	24,253	28,614	27,908	18,809	17,141	18,714		24,100	24,500
Employers Life Insurance	82	74	67	54	67	72		100	100
Workers' Compensation	70	70	130	130	130	130		100	100
Unemployment Compensation	0	6,840	2,320	0	10,443	415		0	0
Investigators & Well Being	129,455	148,522	136,961	138,880	143,963	121,056		120,000	120,000
Per Diem - Board Members	15,168	23,724	39,000	69,500	72,200	62,000		57,600	57,600
Legal	86,068	63,000	43,824	13,144	6,882	650		0	0
Personnel - Other	4,576	2,849	2,638	2,958	16,258	2,730		0	0
Temporary Manpower Services	13,371	2,990	7,182	17,647	26,387	29,046		20,000	20,000
<b>Total Personnel Costs</b>	<b>518,924</b>	<b>539,258</b>	<b>589,084</b>	<b>563,400</b>	<b>658,926</b>	<b>599,305</b>		<b>664,300</b>	<b>673,000</b>
Rent/Utilities	32,638	33,857	34,172	36,009	38,648	35,843		40,000	40,000
Printing/Mailing	24,395	25,647	30,583	10,163	11,103	9,529		9,100	9,100
Dues/Subscriptions	4,528	9,705	540	6,271	8,589	11,996		12,000	12,000
IT/Phone/equipment supplies	30,288	40,402	38,307	70,722	52,363	62,177		52,000	52,000
Furniture/Office Supplies	23,041	8,219	5,863	5,691	4,305	3,581		900	900
Fairs/AV Equipment	0	400	0	2,165	41,954	71		0	0
Travel	62,843	103,589	70,858	116,287	79,160	57,676		70,000	70,000
online credit card processing Bank Fees	0	0	2,658	12,649	3,583	18,134		4,000	18,000
Record Storage Fees	0	0	0	0	0	34,859		0	0
Operating-unassigned	843	3,198	5,035	4,066	5,316	8,011		42,000	28,000
<b>Total Operating Costs</b>	<b>178,576</b>	<b>225,018</b>	<b>188,017</b>	<b>264,023</b>	<b>245,021</b>	<b>241,877</b>		<b>230,000</b>	<b>230,000</b>
<b>Total Expenditures</b>	<b>697,500</b>	<b>764,276</b>	<b>777,100</b>	<b>827,423</b>	<b>903,947</b>	<b>841,182</b>		<b>894,300</b>	<b>903,000</b>
<b>Revenue</b>									
License Application Fees	49,185	88,786	24,062	83,174	141,580	65,240		166,000	155,100
License Renewal Fees	201,219	706,945	253,940	941,320	293,720	1,017,245		329,000	887,000
License Reinstatement Fees	5,895	27,885	2,195	8,250	5,640	5,860		6,000	2,000
Verifications; Licensee Lists	12,663	53,496	17,685	50,045	65,684	43,985		90,000	45,500
Fines	50,726	162,337	185,031	29,417	25,778	7,297			
<b>Total Revenue</b>	<b>319,689</b>	<b>1,039,450</b>	<b>482,914</b>	<b>1,112,206</b>	<b>532,402</b>	<b>1,139,627</b>		<b>591,000</b>	<b>1,089,600</b>

# Kentucky Board of Dentistry Financial Report

## MONTHLY TOTALS FOR FEBRUARY and YEARLY TOTALS FISCAL YEAR 2014-15 (July 1, 2014 - June 30, 2015)

REVENUE	ACTUAL Feb 1 - Feb 28	ACTUAL July-February	BUDGETED July-February	OVER/(UNDER) BUDGET July-February	Fiscal Year TOTAL BUDGET July 2014-June 2015
License Application Fees		\$109,080	\$110,667	\$1,587	\$166,000
License Renewal Fees	\$525	\$290,965	\$219,333	\$71,632	\$329,000
License Reinstatement Fees		\$1,930	\$4,000	\$2,070	\$6,000
Verifications; Licensee Lists		\$47,138	\$60,000	\$12,862	\$90,000
Fines		\$14,000	\$0	\$14,000	\$0
<b>TOTAL REVENUE</b>	<b>\$525</b>	<b>\$463,113</b>	<b>\$394,000</b>	<b>\$69,113</b>	<b>\$591,000</b>

EXPENDITURES	ACTUAL Feb 1-28	ACTUAL July-Feb	BUDGETED July-Feb	(OVER) / UNDER BUDGET July-Feb	Fiscal Year TOTAL BUDGET July 2014-June 2015
Regular Salaries & Wages	\$22,138	\$182,450	\$203,467	\$21,017	\$305,200
Seasonal Salaries & Wages	\$0	\$0	\$0	\$0	\$0
Employers FICA	\$1,723	\$14,692	\$14,600	\$92	\$21,900
Employers Retirement	\$8,583	\$68,414	\$76,867	\$8,453	\$115,300
Employers Health Insurance	\$2,270	\$15,296	\$16,067	\$771	\$24,100
Employers Life Insurance	\$4	\$51	\$67	\$16	\$100
Workers' Compensation	\$0	\$190	\$67	\$123	\$100
Unemployment Compensation	\$0	\$0		\$0	\$0
Investigator	\$4,840	\$39,575	\$40,000	\$425	\$60,000
Well Being Committee	\$0	\$37,500	\$40,000	\$2,500	\$60,000
Per Diem - Board Members	\$2,600	\$24,000	\$38,400	\$14,400	\$57,600
Board Member Liability Insurance	\$0	\$4,277	\$0	\$4,277	\$0
Legal	\$500	\$6,000	\$0	\$6,000	\$0
Personnel - Other	\$0	\$0	\$0	\$0	\$0
Temporary Manpower Services	\$0	\$2,172	\$13,333	\$11,161	\$20,000
Rent/Utilities	\$862	\$29,796	\$26,667	\$3,129	\$40,000
Printing/Mailing	\$96	\$4,260	\$6,067	\$1,807	\$9,100
Dues/Subscriptions	\$393	\$9,066	\$8,000	\$1,066	\$12,000

AADB \$5,460, AADA \$300, CITA \$945, SCDDE \$200, CRDTs \$50, KY BAR \$310 ea, CLEAR \$240, WESTLAW \$197 mo

IT/Phone/equipment supplies	\$1,447	\$19,597	\$34,667	\$15,070	\$52,000
Office Supplies	\$1,530	\$4,184	\$600	\$3,584	\$900
Fairs/AV Equipment	\$0	\$0	\$0		\$0
Travel	\$5,518	\$22,671	\$46,667	\$23,996	\$70,000
online credit card processing Bank Fees	\$2,511	\$3,940	\$2,667	\$1,277	\$4,000
Record Storage Fees	\$0	\$0	\$0	\$0	\$0
Operating-unassigned	\$943	\$3,868	\$28,000	\$24,132	\$42,000
<b>TOTAL EXPENDITURES</b>	<b>\$55,959</b>	<b>\$492,000</b>	<b>\$596,200</b>	<b>\$104,200</b>	<b>\$894,300</b>



# Kentucky Licensee Demographics Report

March 6, 2015

## DENTAL POPULATION: 3/6/2015

dentists with an active KY license	2904
active specialty licenses	510
endodontists	44
oral pathologists	8
oral radiologist	3
oral surgeons	117
orthodontists	157
pediatrics	109
periodontists	56
prosthodontists	16
active sedation permits	333
deep sedation/general anesthesia	103
minimum pediatric	4
moderate enteral sedation	43
moderate parenteral sedation	98
moderate pediatric	21
minimal pediatric & moderate enteral	6
minimal pediatric & moderate parenteral	7
moderate pediatric & moderate enteral	16
moderate pediatric & moderate parenteral	51
KY licensed dentists practicing in KY	2491
KY licensed dentists practicing out of state	413
active licenses issued since 7/1/14	14
active licenses issued since 1/1/2015	2

## REGISTERED DENTAL HYGIENE POPULATION: 3/6/2015

registered dental hygienists with an active KY license	2501
block & infiltration anesthesia & nitrous oxide analgesia certification	1315
general supervision registration	1178
laser debridement registration	336
IV access line registration	4
public health registered dental hygienists	45
KY licensed registered dental hygienists who reside in KY	2159
active licenses issued since 7/1/14	45
active licenses issued since 1/1/2015	13

## REGISTERED DENTAL LABORATORIES: 3/6/2015

250